

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JACQUES LANGFORD,

Plaintiff,

-against-

CITY OF NEW YORK, NYPD OFFICER BRYAN
VAUGHAN, Tax No. 951372, NYPD OFFICER BRIAN
DONOHUE, NYPD SERGEANT JESSE TERLINSKY,
Shield No. 3063, and JOHN/JANE DOE POLICES
OFFICERS,

Defendants.
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**RULE 41(a)(1)(A)(ii)
STIPULATION OF
VOLUNTARY
DISMISSAL AND
WITHDRAWAL WITH
PREJUDICE**

18-CV-3143 (AMD) (SJB)

WHEREAS, plaintiff Jacques Langford commenced this action by filing a complaint, on or about May 29, 2018, alleging that defendants City of New York, NYPD Officer Bryan Vaughan, Tax No. 951372, NYPD Officer Brian Donohue, NYPD Sergeant Jesse Terlinsky, and John/Jane Doe Police Officers violated plaintiff's federal civil rights; and

WHEREAS, plaintiff now seeks to voluntarily dismiss his claims against the defendants with prejudice; and

WHEREAS, plaintiff has authorized his counsel to agree to the terms set forth below;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned as follows:

1. The above-referenced action is hereby dismissed with prejudice.
2. Any and all claims and rights of action arising out of the facts and circumstances that are the subject of this action, and that were asserted or could have been asserted from those facts and circumstances by or on behalf of plaintiff Jacques Langford against defendants City of New York, Sergeant Jesse Terlinsky, Officer Brian Donohue, and Officer

Bryan Vaughan, and their successors and assigns, and all past and present officials, employees, representative and/or agents of the City, are hereby dismissed and discontinued with prejudice, and without attorney's fees, costs or disbursements to any party.

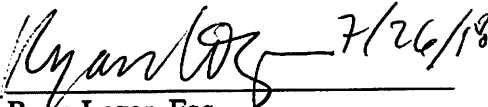
3. Nothing contained herein shall be deemed to be an admission by defendants that they have in any manner or way violated plaintiff's rights, or the rights of any other person or entity, as defined in the constitutions, statutes, ordinances, rules or regulations of the United States, the State of New York, or the City of New York or any other rules, regulations or bylaws of any department or subdivision of the City of New York. This stipulation shall not be admissible in, nor is it related to, any other litigation or settlement negotiations.

4. Nothing contained herein shall be deemed to constitute a policy or practice of the City of New York or any agency thereof.

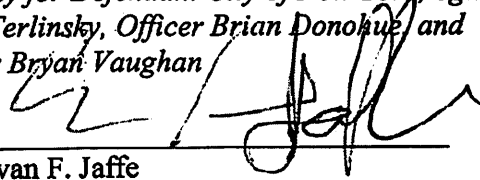
5. This Stipulation and Order contains all the terms and conditions agreed upon by the parties hereto, and no oral agreement entered into at any time nor any written agreement entered into prior to the execution of this Stipulation and Order regarding the subject matter of the instant proceeding shall be deemed to exist, or bind the parties hereto, or to vary the terms and conditions contained herein. This stipulation shall be binding upon the parties immediately upon signature and shall be submitted to the Court for entry as an Order

Dated: _____, 2018
New York, New York

RYAN M. LOZAR
Attorney for Plaintiff Jacques Langford

By:  7/26/18
Ryan Lozar, Esq.
305 Broadway, 14th Floor
New York, New York 10008

ZACHARY W. CARTER
Corporation Counsel of the City of New York
Attorney for Defendant City of New York, Sgt. Jesse Terlinsky, Officer Brian Donohue and Officer Bryan Vaughan

By:  7/26/18
Evan F. Jaffe
Assistant Corporation Counsel
100 Church Street
New York, New York 10007

SO ORDERED:

HONORABLE ANN DONNELLY
United States District Judge